

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

REV. XIU HUI “JOSEPH” JIANG,	)	
	)	
Plaintiff,	)	Case No. 4:15-cv-01008
	)	
v.	)	JURY TRIAL DEMANDED
	)	
TONYA LEVETTE PORTER, ET AL.,	)	
	)	
Defendants.	)	

**MOTION TO WITHDRAW OF PLAINTIFF’S COUNSEL**  
**D. JOHN SAUER AND MICHAEL C. MARTINICH-SAUTER**

The undersigned counsel for Plaintiff, D. John Sauer and Michael C. Martinich-Sauter, respectfully request leave of this Court to withdraw as counsel for the Plaintiff in this case. Both Mr. Sauer and Mr. Martinich-Sauter have agreed to take positions in the Office of the Attorney General of Missouri, so they are leaving private practice and transferring their matters to other counsel. Attorney Mr. Neil Bruntrager of Bruntrager & Billings, P.C., has agreed to represent the Plaintiff in this matter and will be entering his appearance on behalf of the Plaintiff. Because new counsel will need significant time to get up to speed on the factual complexity and complicated procedural history of this case, Plaintiff is separately filing a motion to extend each of the deadlines in the Court’s Scheduling Order, Doc. 187, by approximately four months, with the consent of all Defendants.

WHEREFORE, Plaintiff respectfully requests that the Court grant D. John Sauer and Michael C. Martinich-Sauter leave to withdraw as counsel for Plaintiff, and grant such other and further relief as the Court deems just and proper.

Dated: January 9, 2017

Respectfully Submitted,

James Otis Law Group, LLC

/s/ D. John Sauer

D. John Sauer, 58721MO

Michael Martinich-Sauter, 66065MO

12977 North Forty Drive

St. Louis, Missouri 63141

Telephone: (314) 682-6067

jsauer@jamesotis.com

*Attorneys for Plaintiff Rev. Xiu Hui “Joseph” Jiang*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was served via the Court's electronic-filing system, on January 9, 2017, on:

J. Brent Dulle  
Associate City Counselor  
1200 Market Street  
City Hall Room 314  
St. Louis, Missouri 63103  
DulleB@stlouis-mo.gov  
*Attorneys for Defendants Porter, Pitterle, and City of St. Louis*

Brian J. Klopfenstein  
215 S. Platte Clay Way, Suite B  
Kearney, Missouri 64060  
bjkattorney@fairpoint.net  
*Attorney for Defendant N.M.*

Amy Lorenz-Moser  
Daniel J. Carpenter  
Carpenter Moser, LLC  
1716 Hidden Creek Court, Suite 101  
St. Louis, Missouri 63131  
amy@carpentermoser.com  
dan@carpentermoser.com  
*Attorneys for Defendants SNAP, Clohessy, and Dorris*

/s/ D. John Sauer